

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

vs.

ALEXANDER JAMES BURKE

CRIMINAL NO. 14-565

HONORABLE JOEL H.  
SLOMSKY

**ORDER**

AND NOW, This \_\_\_\_\_ day of September 2015, it is ORDERED that Defendant's presence is waived for the motions hearing scheduled for October 8, 2015.

BY THE COURT:

\_\_\_\_\_  
HONORABLE JOEL H. SLOMSKY

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Attorney for Defendant

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**MOTION TO WAIVE DEFENDANT'S PRESENCE AT MOTIONS HEARING**

- 1) Defendant, Alexander James Burke, by and through his undersigned counsel, respectfully requests that the Court excuse his presence at the motions hearing currently scheduled for October 8, 2015 and allow his attorney, Evan Hughes, to stand on his behalf.
- 2) In the alternative, Defendant could appear for the hearing telephonically.


- 3) As the Court is aware, Defendant lives in London and would have to undergo substantial travel burden by having to travel to the United States for the one motions hearing.
- 4) Defendant's trial is expected to last a significant number of days, possibly weeks, and Defendant will need to arrive to the United States at least a week prior to trial in order to prepare with defense counsel.
- 5) Since Defendant will have to expend a substantial amount of money on travel during the trial preparation period, Defendant would respectfully request that he not have to attend the one day motions hearing in person.
- 6) Defendant is respectfully requesting that this Honorable Court either waive his appearance or allow for him to appear to the motions hearing telephonically.
- 7) In addition, as the Court is aware, Defendant filed for a continuance of the trial on September 22, 2015.
- 8) If the Court is inclined to grant the continuance request, Defendant would respectfully request that the motions date be rescheduled for a date that is closer to the time of trial so that trial preparations can be adequately adjusted for both the defense and the government.

Based on the foregoing, Defendant respectfully requests that Defendant's appearance be waived or he be allowed to join telephonically at the motions hearing scheduled for October 8, 2015.

**DATED** this 23rd day of September, 2015.

**THE HUGHES FIRM, LLC**


/s/

By  \_\_\_\_\_

Evan T.L. Hughes, Esq.  
Attorney for Defendant

VERIFICATION

I, Evan T.L. Hughes, hereby verify that the foregoing statements are accurate and made subject to the penalties of perjury.

/s/   
By \_\_\_\_\_


Evan T.L. Hughes, Esq.

CERTIFICATE OF SERVICE

I, hereby certify, that on this date a true and correct copy of this Motion was served upon the United States via electronic notice.

/s/

By

  
\_\_\_\_\_

Evan T.L. Hughes, Esq.